



U.S. Department of Justice

United States Attorney  
District of Massachusetts

Main Reception: (413) 785-0235  
Fax: (413) 785-0394

Federal Building & Courthouse  
Main Street, Room 310  
Springfield, Massachusetts 01103

March 3, 2006

Michael L. Foy, Esq.  
935 Main Street, Suite 203  
Springfield, MA 01103

Lori H. Levinson, Esq.  
66 West Street  
Pittsfield, MA 01201

Re: United States v. Frank Depergola, et al.  
Criminal No. 05-30002-MAP

FILED  
U.S. DISTRICT COURT  
DISTRICT OF MASS.  
006-1111-3 P 2:10

Dear Attorneys Foy and Levinson:

In accordance with the government's continuing discovery obligations pursuant to Local Rule 116.1(C), 116.2(B), Fed. R. Crim. P. 16(a)(1), and F.R. Evid. 701 through 705 I am providing you with the following information and materials.

I presently intend to call in the government's case-in-chief FBI SA Michael A. Campi as the government's expert witness regarding loansharking and La Cosa Nostra (LCN). Enclosed is a three page resume for SA Campi and a four page Description of the Structure of Cosa Nostra written by SA Campi. Also enclosed are pages 3017 through 3149 of the trial transcript in United States v. Alex Rudaj, et al. and pages 1 through 247 and a 32 page index of the trial transcript for April 7, 2005 in the trial of United States v. Dominick Cirillo, et al. These transcripts are the testimony of SA Campi for the only two times he has testified as an expert regarding the LCN and loansharking of which I am aware. I have not attempted to obtain trial transcripts for unrelated testimony of SA Campi. SA Campi has reviewed the transcripts and/or the recordings of the meetings between the cooperating witness (CW) and the defendants which the government will offer in evidence at trial and which have been provided to you in discovery.

I will ask SA Campi to explain to the jury the definition of loansharking terms used in the recordings, such as vig, juice, off the top, and others. I will also ask SA Campi to explain to the jury how the loansharking business works. SA Campi will testify that loanshark loans are made at usurious rates of interest, with no collateral and no documentation. He will testify that because collection of these loans is not enforceable through normal collection procedures including the court system, if a debtor fails to pay, threats and ultimately violence will be used to collect the loan. SA Campi will testify that the debtor must make weekly interest payments, that these weekly payments do not reduce the principle and that the principle must be paid off in a lump sum. He will testify that the loans and payments are made in cash. SA Campi will also testify that in his opinion the collections from the CW by both defendants involve the use of extortionate means.

SA Campi will also testify regarding the LCN generally and the Genovese Family specifically. He will testify regarding Al Bruno's role and position within the LCN. SA Campi will testify regarding Bruno's role in the loans made to the CW and collected by the defendants. He will testify that during one of the recorded meetings among Bruno, Frank Depergola and the CW, that Bruno had the authority to require the parties to make an arrangement regarding repayment of the loan. SA Campi will also testify that loansharking in the Springfield area is controlled by members and associates of the LCN.

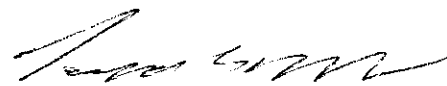
This is not a comprehensive list of the testimony but rather a summary of the expected testimony. SA Campi will be testifying based upon his training as an FBI agent and his 20 years of experience in investigating numerous LCN and loansharking cases.

Please feel free to call me at (413) 785-0235 if you have any questions about the above information.

Very truly yours,

MICHAEL J. SULLIVAN  
United States Attorney

By:



TODD E. NEWHOUSE  
Assistant U.S. Attorney

Enclosures

cc: / Bethany Healy,  
Courtroom Clerk  
Hon. Kenneth P. Neuman  
United States Magistrate Judge  
(w/o enclosures);